

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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UNITED STATES OF AMERICA

- V. -

RONALD JOHNSON,
a/k/a "Top Gun,"
MARKUS ANDERSON,
a/k/a "Sparks,"
SAVON BAGBY,
a/k/a "Baggs,"
NATQUAN CATTS,
a/k/a "Nate,"
a/k/a "Scoop,"
JAHQUEZ COLEMAN,
a/k/a "Quez the Rapper,"
a/k/a "Quez,"
WALTER COLEMAN,
a/k/a "BB,"
CHEVEZ DERELLO,
a/k/a "Vezy,"
LEONARD DERELLO,
a/k/a "Lenny Boy,"
TYRECK DOUGLAS,
a/k/a "Little Ty,"
ERVING FERZAN,
a/k/a "Erv,"
RAKEE JOHNSON,
a/k/a "Spaz,"
a/k/a "Zetho,"
GLORIOUS LANDRUM,
a/k/a "Gus,"
COREY LATIMER,
a/k/a "Fonzi,"
ANTOINE MCKINNON,
a/k/a "Twon,"
a/k/a "Cuzzi,"
WAYNE MORGAN,
a/k/a "Chum Chum,"
CARLOS OCASIO,
a/k/a "Leak,"
a/k/a "Pimp,"
GORDON RIDDICK,

SEALED INDICTMENT

17 Cr. 505()

a/k/a "Stacky G's,"	:
a/k/a "Stacks,"	:
KEENAN WATTS,	:
a/k/a "Milleone,"	:
a/k/a "Mills,"	:
KWAMENE WILLIAMS,	:
a/k/a "Kwa,"	:
a/k/a "Rich Quality,"	:
	:
Defendants.	:
	:
	X

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COUNT ONE

The Grand Jury charges:

THE ENTERPRISE

1. At all times relevant to this Indictment, RONALD JOHNSON, a/k/a "Top Gun," MARKUS ANDERSON, a/k/a "Sparks," SAVON BAGBY, a/k/a "Baggs," NATQUAN CATTs, a/k/a "Nate," a/k/a "Scoop," JAHQUEZ COLEMAN, a/k/a "Quez," a/k/a "Quez the Rapper," WALTER COLEMAN, a/k/a "BB," CHEVEZ DERELLO, a/k/a "Vezy," LEONARD DERELLO, a/k/a "Lenny Boy," TYRECK DOUGLAS, a/k/a "Little Ty," ERVING FERZAN, a/k/a "Erv," RAKEE JOHNSON, a/k/a "Spaz," a/k/a "Zetho," COREY LATIMER, a/k/a "Fonzi," ANTOINE MCKINNON, a/k/a "Twon," a/k/a "Cuzzi," WAYNE MORGAN, a/k/a "Chum Chum," GORDON RIDDICK, a/k/a "Stacky G's," a/k/a "Stacks," and KEENAN WATTS, a/k/a "Milleone," a/k/a "Mills," the defendants, and others known and unknown, were members and associates of the Downtown Gang ("Downtown" or the "Enterprise"), a criminal organization whose members and associates engaged in, among other things, narcotics

trafficking, acts involving robbery, acts involving murder, and other acts of violence. Downtown operated principally in and around the City of Poughkeepsie, New York.

2. Downtown, including its leadership, membership, and associates, constituted an "enterprise," as defined by Title 18, United States Code, Section 1961(4), that is, a group of individuals associated in fact, although not a legal entity. The Enterprise constituted an ongoing organization whose members functioned as a continuing unit for a common purpose of achieving the objectives of the Enterprise. At all times relevant to this Indictment, the Enterprise has engaged in, and its activities affected, interstate and foreign commerce. The defendants participated in the operation of the Enterprise, and participated in unlawful and other activities in furtherance of the conduct of the Enterprise's affairs.

3. RONALD JOHNSON, a/k/a "Top Gun," MARKUS ANDERSON, a/k/a "Sparks," SAVON BAGBY, a/k/a "Baggs," NATQUAN CATTS, a/k/a "Nate," a/k/a "Scoop," JAHQUEZ COLEMAN, a/k/a "Quez," a/k/a "Quez the Rapper," WALTER COLEMAN, a/k/a "BB," CHEVEZ DERELLO, a/k/a "Vezy," LEONARD DERELLO, a/k/a "Lenny Boy," TYRECK DOUGLAS, a/k/a "Little Ty," ERVING FERZAN, a/k/a "Erv," RAKEE JOHNSON, a/k/a "Spaz," a/k/a "Zetho," COREY LATIMER, a/k/a "Fonzi," ANTOINE MCKINNON, a/k/a "Twon," a/k/a "Cuzzi," WAYNE MORGAN, a/k/a "Chum Chum," GORDON RIDDICK, a/k/a "Stacky G's," a/k/a "Stacks," and

KEENAN WATTS, a/k/a "Milleone," a/k/a "Mills," the defendants, and others known and unknown, were leaders, members, and associates of the Enterprise who carried out and directed other members of the Enterprise in carrying out unlawful and other activities in furtherance of the conduct of the Enterprise's affairs.

4. Downtown has been engaged in a long-standing, and violent, feud with a rival Poughkeepsie street gang referred to as "Uptown." Over the course of this conflict, Downtown members and associates have committed several acts of violence against their Uptown rivals, including several non-fatal shootings.

5. Downtown is a criminal organization whose members referred to themselves by and were known by several different names. Those names include the "420 Boys," "L-Block," "C-Eazy Gang," "Most Hated," "Hamo Gang," the "YGz," and the "Bully Hard Hunna" set of the Bloods. Members of Downtown referred to themselves and each other by different combinations of these names, all of which referred to the same Enterprise. Members who referred to themselves by these names resided and/or operated in and around the Poughkeepsie. These different names typically arose from various musical groups within the organization or fallen members or associates. Although members of Downtown referred to themselves by different names, there was significant overlap in the names individual members used, and members, regardless of name, worked together as a single organization protecting the same territory.

Members who referred to themselves by these various names were not confined to a subgroup territory to engage in criminal activities. The members who referred to themselves by these different names did not possess territory separate and apart from Downtown. Members who called themselves by these different names had permission to engage in criminal activities anywhere within Downtown territory without fear of retaliation from members who referred to themselves by other names because, at their core, they are all members of Downtown.

6. Although Downtown did not maintain a formal or rigid hierarchy, certain members and associates enjoyed significant power and respect within the organization. RONALD JOHNSON, a/k/a "Top Gun," the defendant, acted as one of Downtown's leaders who could, and did, call meetings of Downtown members. In this capacity, JOHNSON directed the activities of Downtown members and evaluated the contributions of Downtown gang members to the Enterprise's endeavors. At these meetings, Downtown gang members discussed, among other things, their criminal activities.

7. Downtown had multiple criminal objectives, one of which was the operation of drug markets in certain locations in Poughkeepsie, which distributed heroin, cocaine base, or "crack," and marijuana. In particular, Downtown controlled drug markets from west of Hamilton Street to the Hudson River, specifically in the vicinity of the Martin Luther King and Rip Van Winkle housing

projects, commonly referred to as "the Ville," and "the Rip," respectively.

8. DOWNTOWN allowed its members and associates, no matter the name they used, to sell narcotics in areas of Poughkeepsie controlled by DOWNTOWN. As part of these endeavors, members and associates of DOWNTOWN assisted each other with the sale of narcotics, held narcotics for each other, and held and shared firearms to protect DOWNTOWN members from rivals. Generally speaking, non-members, outsiders, and rival narcotics dealers/gang members were prohibited or prevented from distributing narcotics in areas controlled by DOWNTOWN, most notably, the Ville and the Rip.

9. Other individuals who were not members of DOWNTOWN conspired with DOWNTOWN members to operate the drug markets in Poughkeepsie. Among other things, these associates of DOWNTOWN helped supply its members with narcotics, and otherwise aided the criminal activities of DOWNTOWN, including narcotics distribution.

10. Certain members and associates of DOWNTOWN committed, agreed, attempted, and threatened to commit acts of violence to protect and expand their drug trafficking operation and to protect fellow members and associates of the Enterprise. These acts of violence included assaults, robbery, attempted murder, and murder, intended either to protect DOWNTOWN's members,

enforce discipline amongst members of Downtown, or to otherwise promote the standing and reputation of Downtown.

PURPOSES OF THE ENTERPRISE

11. The purposes of the Enterprise included but were not limited to the following:

a. Preserving and protecting the power, territory, and profits of the Enterprise through assaults, attempted murders, murders, and other acts of violence, and threats of violence.

b. Promoting and enhancing the Enterprise and the activities of its members and associates.

c. Keeping victims and potential victims in fear of the Enterprise and its members and associates through acts and threats of violence.

d. Providing assistance to members and associates who committed crimes for and on behalf of the Enterprise.

e. Enriching the members and associates of the Enterprise through, among other things, robberies, and the distribution and sale of controlled substances, including crack cocaine, heroin, and marijuana.

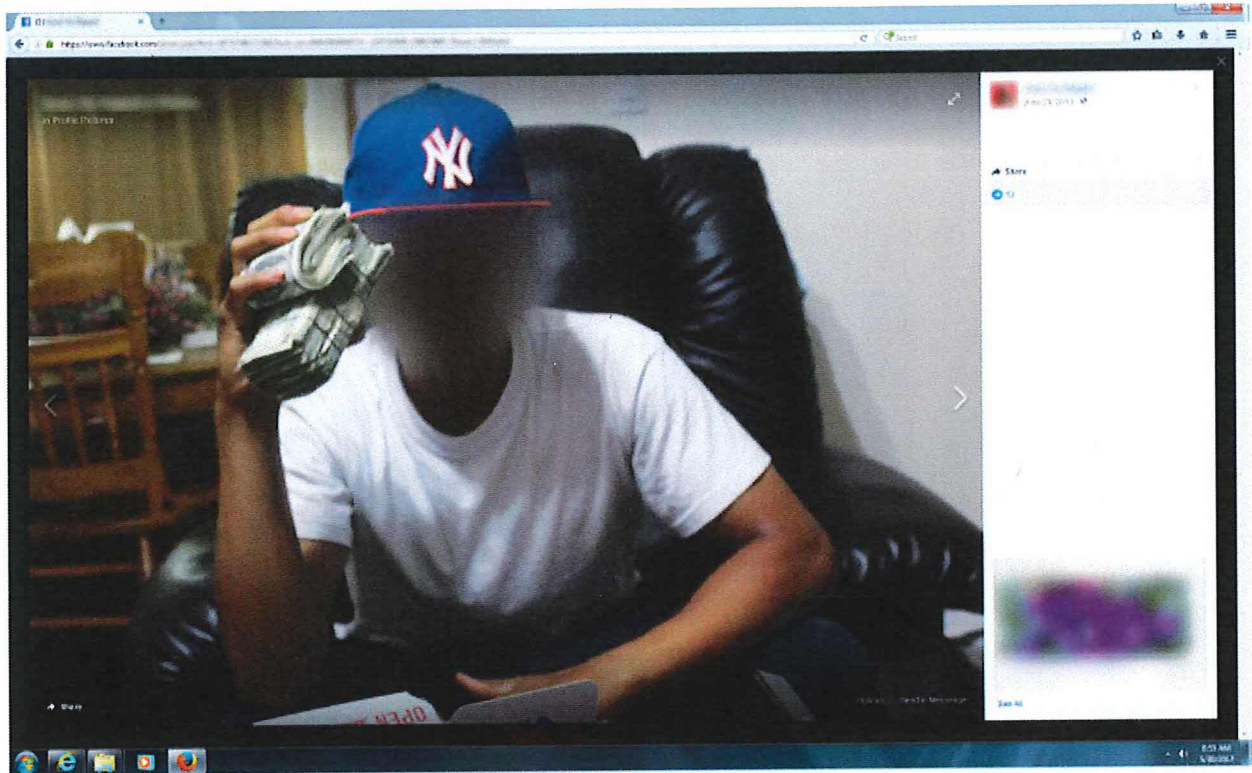
MEANS AND METHODS OF THE ENTERPRISE

12. Among the means and methods employed by the members and associates in conducting and participating in the conduct of the affairs of the Enterprise were the following:

a. Members and associates of the Enterprise committed, conspired, attempted, and threatened to commit acts of violence, including robbery, assault, attempted murder, and murder against rival gang members and other individuals adverse to the Enterprise to protect and expand the Enterprise's criminal operations, including the distribution of narcotics.

b. Members and associates of the Enterprise used threats of violence, including murder, against other members and associates to enforce and maintain discipline within the Enterprise.

c. Members and associates promoted the Enterprise on social media websites such as Facebook and YouTube. For example, Downtown members posted written posts, videos, and photographs during which they, among other things, referenced various subgroup names, shootings, firearms, and drug dealing. As one specific example, on or about June 26, 2013, JAHQUEZ COLEMAN, a/k/a "Quez," a/k/a "Quez the Rapper," the defendant, posted the following photograph, which has been redacted, displaying a wad of cash, representing proceeds of drug sales:



d. Members and associates of the Enterprise displayed certain signs and wore certain clothing emblazoned with various Downtown subgroup names to identify themselves and communicate with one another.

e. Members and associates of the Enterprise obtained, possessed, and used firearms.

f. Members and associates of the Enterprise distributed controlled substances, including heroin, crack cocaine, and marijuana.

g. Members and associates of the Enterprise held meetings to discuss gang business and discuss current and future activities.

THE RACKETEERING CONSPIRACY

13. From at least in or about 2012, up to and including in or about 2017, in the Southern District of New York and elsewhere, RONALD JOHNSON, a/k/a "Top Gun," MARKUS ANDERSON, a/k/a "Sparks," SAVON BAGBY, a/k/a "Baggs," NATQUAN CATTS, a/k/a "Nate," a/k/a "Scoop," JAHQUEZ COLEMAN, a/k/a "Quez," a/k/a "Quez the Rapper," WALTER COLEMAN, a/k/a "BB," CHEVEZ DERELLO, a/k/a "Vezy," LEONARD DERELLO, a/k/a "Lenny Boy," TYRECK DOUGLAS, a/k/a "Little Ty," ERVING FERZAN, a/k/a "Erv," RAKEE JOHNSON, a/k/a "Spaz," a/k/a "Zetho," COREY LATIMER, a/k/a "Fonzi," ANTOINE MCKINNON, a/k/a "Twon," a/k/a "Cuzzi," WAYNE MORGAN, a/k/a "Chum Chum," GORDON RIDDICK, a/k/a "Stacky G's," a/k/a "Stacks," and KEENAN WATTS, a/k/a "Milleone," a/k/a "Mills," the defendants, and others known and unknown, being persons employed by and associated with the Enterprise described in paragraphs One through Eleven of this Indictment, to wit, Downtown, knowingly combined, conspired, confederated, and agreed together and with each other to violate the racketeering laws of the United States, to wit, Section 1962(c) of Title 18, United States Code, that is, to conduct and participate, directly and indirectly, in the conduct of the affairs of Downtown, which was engaged in, and the activities of which affected, interstate and foreign commerce, through a pattern of racketeering activity consisting of:

a. Multiple acts involving murder, chargeable under the following provisions of state law:

i. New York Penal Law, Sections 20.00, 110.00 and 125.25 (attempted murder);

ii. New York Penal Law, Sections 105.15 and 125.25 (conspiracy to commit murder);

iii. New York Penal Law, Sections 20.00 and 125.25 (murder);

b. Multiple acts involving robbery, chargeable under the following provisions of state law:

i. New York Penal Law, Sections 20.00, 110.00, 160.00, 160.05, 160.10, and 160.15 (attempted robbery);

ii. New York Penal Law, Sections 105.05, 105.10, 160.00, 160.05, 160.10, and 160.15 (conspiracy to commit robbery);

iii. New York Penal Law, Sections 20.00, 160.00, 160.05, 160.10, and 160.15 (robbery);

c. Multiple offenses involving the distribution of controlled substances, including crack cocaine, heroin, and marijuana, in violation of the laws of the United States, namely Title 21, United States Code, Sections 812, 841(a)(1), 841(b)(1)(A), and 846, and Title 18, United States Code, Section 2;

d. Multiple acts indictable under Title 18, United States Code, Sections 1951 and 2.

14. It was part of the conspiracy that RONALD JOHNSON, a/k/a "Top Gun," MARKUS ANDERSON, a/k/a "Sparks," SAVON BAGBY, a/k/a "Baggs," NATQUAN CATTS, a/k/a "Nate," a/k/a "Scoop," JAHQUEZ COLEMAN, a/k/a "Quez," a/k/a "Quez the Rapper," WALTER COLEMAN, a/k/a "BB," CHEVEZ DERELLO, a/k/a "Vezy," LEONARD DERELLO, a/k/a "Lenny Boy," TYRECK DOUGLAS, a/k/a "Little Ty," ERVING FERZAN, a/k/a "Erv," RAKEE JOHNSON, a/k/a "Spaz," a/k/a "Zetho," COREY LATIMER, a/k/a "Fonzi," ANTOINE MCKINNON, a/k/a "Twon," a/k/a "Cuzzi," WAYNE MORGAN, a/k/a "Chum Chum," GORDON RIDDICK, a/k/a "Stacky G's," a/k/a "Stacks," and KEENAN WATTS, a/k/a "Milleone," a/k/a "Mills," the defendants, and others known and unknown, each agreed that a conspirator would commit at least two acts of racketeering activity in the conduct of the affairs of the Enterprise.

(Title 18, United States Code, Section 1962(d).)

COUNT TWO

The Grand Jury further charges:

15. At all times relevant to this Indictment, Downtown, as more fully described in Paragraphs One through Twelve of this Indictment, which are realleged and incorporated by reference as though fully set forth herein, including its leadership, its membership, and its associates, constituted an enterprise as

defined in Title 18, United States Code, Section 1959(b)(2), that is, a group of individuals associated in fact which was engaged in, and the activities of which affected, interstate and foreign commerce. The Enterprise constituted an ongoing organization whose members functioned as a continuing unit for a common purpose of achieving the objectives of the Enterprise.

16. At all times relevant to this Indictment, the above-described Enterprise, through its members and associates, engaged in racketeering activity as defined in Title 18, United States Code, Sections 1959(b)(1) and 1961(1), namely acts involving murder and robbery in violation of the laws of New York State, offenses involving drug trafficking in violation of Title 21, United States Code, Sections 812, 841, and 846, and acts indictable under Title 18, United States Code, Sections 1951 and 2.

17. On or about April 9, 2014, in the Southern District of New York, TYRECK DOUGLAS, a/k/a "Little Ty," GORDON RIDDICK, a/k/a "Stacky G's," a/k/a "Stacks," and MARKUS ANDERSON, a/k/a "Sparks," the defendants, and others known and unknown, as consideration for the receipt of, and as consideration for a promise and agreement to pay, a thing of pecuniary value from Downtown, and for the purpose of gaining entrance to and maintaining and increasing position in Downtown, an enterprise engaged in racketeering activity, as described above,

intentionally and knowingly attempted to murder an individual; and aided and abetted the same, to wit, DOUGLAS, RIDDICK, and ANDERSON travelled together with three guns in an attempt to shoot and kill multiple rival gang members, and DOUGLAS shot at multiple rival gang members in the vicinity of Main Street, in violation of New York Penal Law, Sections 20.00, 125.25, and 110.00.

(Title 18, United States Code, Sections 1959(a)(5) and 2.)

COUNT THREE

The Grand Jury further charges:

18. At all times relevant to this Indictment, Downtown, as more fully described in Paragraphs One through Twelve of this Indictment, which are realleged and incorporated by reference as though fully set forth herein, including its leadership, its membership, and its associates, constituted an enterprise as defined in Title 18, United States Code, Section 1959(b)(2), that is, a group of individuals associated in fact which was engaged in, and the activities of which affected, interstate and foreign commerce. The Enterprise constituted an ongoing organization whose members functioned as a continuing unit for a common purpose of achieving the objectives of the Enterprise.

19. At all times relevant to this Indictment, the above-described Enterprise, through its members and associates, engaged in racketeering activity as defined in Title 18, United States Code, Sections 1959(b)(1) and 1961(1), namely acts

involving murder and robbery in violation of the laws of New York State, offenses involving drug trafficking in violation of Title 21, United States Code, Sections 812, 841, and 846, and acts indictable under Title 18, United States Code, Sections 1951 and 2.

20. On or about April 4, 2014, in the Southern District of New York, TYRECK DOUGLAS, a/k/a "Little Ty," the defendant, and others known and unknown, as consideration for the receipt of, and as consideration for a promise and agreement to pay, a thing of pecuniary value from Downtown, and for the purpose of gaining entrance to and maintaining and increasing position in Downtown, an enterprise engaged in racketeering activity, as described above, intentionally and knowingly attempted to murder an individual; and aided and abetted the same, to wit, DOUGLAS, the defendant, shot at multiple rival gang members, in the vicinity of Main Street, between Boulevard Knolls and North Grand Avenue, in Poughkeepsie, New York, and aided and abetted the same, in violation of New York Penal Law, Sections 20.00, 125.25, and 110.00.

(Title 18, United States Code, Sections 1959(a)(5) and 2.)

COUNT FOUR

The Grand Jury further charges:

21. From at least in or about 2015, up to and including in or about 2017, in the Southern District of New York and

elsewhere, CARLOS OCASIO, a/k/a "Leak," a/k/a "Pimp," RAKEE JOHNSON, a/k/a "Spaz," a/k/a "Zetho," KWAMENE WILLIAMS, a/k/a "Kwa," a/k/a "Rich Quality," and GLORIOUS LANDRUM, a/k/a "Gus," the defendants, and others known and unknown, intentionally and knowingly did combine, conspire, confederate, and agree together and with each other to violate the narcotics laws of the United States.

22. It was a part and an object of the conspiracy that CARLOS OCASIO, a/k/a "Leak," a/k/a "Pimp," RAKEE JOHNSON, a/k/a "Spaz," a/k/a "Zetho," KWAMENE WILLIAMS, a/k/a "Kwa," a/k/a "Rich Quality," and GLORIOUS LANDRUM, a/k/a "Gus," the defendants, and others known and unknown, would and did distribute and possess with intent to distribute controlled substances, in violation of Title 21, United States Code, Section 841(a)(1).

23. The controlled substance that CARLOS OCASIO, a/k/a "Leak," a/k/a "Pimp," RAKEE JOHNSON, a/k/a "Spaz," a/k/a "Zetho," KWAMENE WILLIAMS, a/k/a "Kwa," a/k/a "Rich Quality," and GLORIOUS LANDRUM, a/k/a "Gus," the defendants, conspired to distribute and possess with intent to distribute was one kilogram and more of mixtures and substances containing a detectable amount of heroin, in violation of Title 21, United States Code, Section 841(b)(1)(A).

(Title 21, United States Code, Section 846.)

COUNT FIVE

The Grand Jury further charges:

24. From at least in or about 2012 up to and including in or about 2017, in the Southern District of New York and elsewhere, MARKUS ANDERSON, a/k/a "Sparks," JAHQUEZ COLEMAN, a/k/a "Quez the Rapper," a/k/a "Quez," CHEVEZ DERELLO, a/k/a "Vezy," LEONARD DERELLO, a/k/a "Lenny Boy," RAKEE JOHNSON, a/k/a "Spaz," a/k/a "Zetho," COREY LATIMER, a/k/a "Fonzi," ANTOINNE McKINNON, a/k/a "Twon," a/k/a "Cuzzi," GORDON RIDDICK, a/k/a "Stacky G's," a/k/a "Stacks," the defendants, during and in relation to a crime of violence for which they may be prosecuted in a court of the United States, namely the racketeering conspiracy charged in Count One of this Indictment, knowingly did use and carry firearms, and, in furtherance of such crime, did possess firearms, and did aid and abet the use, carrying, and possession of firearms.

(Title 18, United States Code, Sections 924(c)(1)(A)(i) and 2.)

COUNT SIX

The Grand Jury further charges:

25. From at least in or about 2012 up to and including in or about 2017, in the Southern District of New York and elsewhere, TYRECK DOUGLAS, a/k/a "Little Ty," the defendant, during and in relation to a crime of violence for which he may be prosecuted in a court of the United States, namely the racketeering conspiracy charged in Count One of this Indictment, knowingly did use and carry firearms, and, in furtherance of such crime, did possess firearms, and did aid and abet the use, carrying, and

possession of firearms, some of which firearms were brandished and discharged.

(Title 18, United States Code, Sections 924(c)(1)(A)(iii) and 2.)

COUNT SEVEN

The Grand Jury further charges:

26. From at least in or about 2012 up to and including in or about 2017, in the Southern District of New York and elsewhere, GLORIOUS LANDRUM, a/k/a "Gus," the defendant, during and in relation to a narcotics trafficking crime for which he may be prosecuted in a court of the United States, namely, the narcotics conspiracy charged in Count Four of this Indictment, knowingly did use and carry firearms, and, in furtherance of such crime, did possess firearms, and did aid and abet the use, carrying, and possession of firearms.

(Title 18, United States Code, Sections 924(c)(1)(A)(i) and 2.)

FORFEITURE ALLEGATION AS TO COUNT ONE

27. As a result of committing the offense alleged in Count One of this Indictment, RONALD JOHNSON, a/k/a "Top Gun," MARKUS ANDERSON, a/k/a "Sparks," SAVON BAGBY, a/k/a "Baggs," NATQUAN CATTS, a/k/a "Nate," a/k/a "Scoop," JAHQUEZ COLEMAN, a/k/a "Quez," a/k/a "Quez the Rapper," WALTER COLEMAN, a/k/a "BB," CHEVEZ DERELLO, a/k/a "Vezy," LEONARD DERELLO, a/k/a "Lenny Boy," TYRECK DOUGLAS, a/k/a "Little Ty," ERVING FERZAN, a/k/a "Erv," RAKEE

JOHNSON, a/k/a "Spaz," a/k/a "Zetho," COREY LATIMER, a/k/a "Fonzi," ANTOINE MCKINNON, a/k/a "Twon," a/k/a "Cuzzi," WAYNE MORGAN, a/k/a "Chum Chum," GORDON RIDDICK, a/k/a "Stacky G's," a/k/a "Stacks," and KEENAN WATTS, a/k/a "Milleone," a/k/a "Mills," the defendants, shall forfeit to the United States, pursuant to Title 18, United States Code, Section 1963:

a. Any interest acquired or maintained in violation of Title 18, United States Code, Section 1962, which interests are subject to forfeiture to the United States pursuant to Title 18, United States Code, Section 1963(a)(1);

b. Any interest in, security of, claim against, or property or contractual right which afford a source of influence over, the enterprise named and described herein which the defendants established, operated, controlled, conducted, and participated in the conduct of, in violation of Title 18, United States Code, Section 1962, which interests, securities, claims, and rights are subject to forfeiture to the United States pursuant to Title 18, United States Code, Section 1963(a)(2); and

c. Any property constituting, or derived from, any proceeds obtained, directly or indirectly, from racketeering activity, in violation of Title 18, United States Code, Section 1962, which property is subject to forfeiture to the United States pursuant to Title 18, United States Code, Section 1963(a)(3).

FORFEITURE ALLEGATION AS TO COUNT FOUR

28. As a result of committing the controlled substance offense charged in Count Three of this Indictment, CARLOS OCASIO, a/k/a "Leak," a/k/a "Pimp," RAKEE JOHNSON, a/k/a "Spaz," a/k/a "Zetho," KWAMENE WILLIAMS, a/k/a "Kwa," a/k/a "Rich Quality," and GLORIOUS LANDRUM, a/k/a "Gus," the defendants, shall forfeit to the United States, pursuant to Title 21, United States Code, Section 853, any property constituting, or derived from, any proceeds the defendant obtained, directly or indirectly, as a result of the offense charged in Count Three, and any property used, or intended to be used, in any manner or part, to commit and to facilitate the commission of said offenses, including but not limited to a sum of money in United States currency representing the amount of proceeds traceable to the commission of the offenses alleged in Count Three.

Substitute Assets Provision

29. If any of the above-described forfeitable property, as a result of any act or omission of RONALD JOHNSON, a/k/a "Top Gun," MARKUS ANDERSON, a/k/a "Sparks," SAVON BAGBY, a/k/a "Baggs," NATQUAN CATTS, a/k/a "Nate," a/k/a "Scoop," JAHQUEZ COLEMAN, a/k/a "Quez," a/k/a "Quez the Rapper," WALTER COLEMAN, a/k/a "BB," CHEVEZ DERELLO, a/k/a "Vezy," LEONARD DERELLO, a/k/a "Lenny Boy," TYRECK DOUGLAS, a/k/a "Little Ty," ERVING FERZAN, a/k/a "Erv," RAKEE JOHNSON, a/k/a "Spaz," a/k/a "Zetho," GLORIOUS LANDRUM, a/k/a

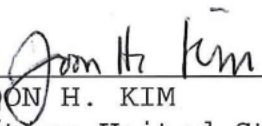
"Gus," COREY LATIMER, a/k/a "Fonzi," ANTOINE McKINNON, a/k/a "Twon," a/k/a "Cuzzi," WAYNE MORGAN, a/k/a "Chum Chum," CARLOS OCASIO, a/k/a "Pimp," a/k/a "Leak," GORDON RIDDICK, a/k/a "Stacky G's," a/k/a "Stacks," KEENAN WATTS, a/k/a "Milleone," a/k/a "Mills," and KWAMENE WILLIAMS, a/k/a "Kwa," a/k/a "Rich Quality," the defendants:

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, third person;
- c. has been placed beyond the jurisdiction of the Court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot be subdivided without difficulty;

it is the intent of the United States, pursuant to Title 18, United State Code, Section 1963(m) and Title 21, United States Code, Section 853(p), to seek forfeiture of any other property of the defendant up to the value of the above forfeitable property.

(Title 18, United States Code, Section 1963, and Title 21, United States Code, Section 853.)


FOREPERSON


JOON H. KIM
Acting United States Attorney

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA

- v. -

RONALD JOHNSON, et al.,
Defendants.


SEALED INDICTMENT

17 Cr. ()

(18 U.S.C. § 924(c), 1959, 1962, and 2;
21 U.S.C. § 846.)

JOON H. KIM
Acting United States Attorney.

A TRUE BILL


Foreperson.
